

REPRESENTATIVE BUILDING ASSESSMENT REPORT



FINAL REPORT PREPARED FOR THE CITY OF ADELAIDE
25 AUGUST 2025

COVER IMAGE: HALIFAX STREET, ADELAIDE 1956 (SLSA B13701)

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FOR:	CITY OF ADELAIDE
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Preparation, review and approval

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1. EXECUTIVE SUMMARY

1.1 BACKGROUND

The City of Adelaide (CoA) has initiated a Code Amendment to update the Historic Area Statements for the 14 Historic Area Overlays within the Council Zone. As part of the Code Amendment process, a Draft Historic Area Statement Report was published by the CoA for consultation in October 2025. This report included 54 properties proposed to be designated as Representative Buildings.

Objections and depositions were received for 16 of the proposed Representative Buildings. The CoA engaged Grieve Gillett Architects (GGA) to assess the 16 proposed Representative Buildings within five Historic Area Overlays and review and provide a summary of the main points raised by objectors, accompanied by a detailed response. This information has been presented in a table format for each property, along with property specific recommendations.

Grieve Gillett Architects (GGA) were engaged by the City of Adelaide (CoA) in May 2025, to assess 16 proposed Representative Buildings within five Historic Area Overlays. The initial review was limited to reviewing the 16 places against the proposed Historic Area Statements that apply to the five HAOs. Subsequent to the preparation of the initial report, GGA were further engaged by the CoA to review additional material in the form of owner's representations and depositions.

This report consolidates the information and findings of the above and provides recommendations for each of the 16 properties in relation to Representative Building designation.

1.2 APPROACH AND KEY TERMINOLOGY

'Representative Buildings', a term used within the *South Australia's Planning and Design Code (the Code)*, are not defined as being 'heritage listed', but are identified as buildings that demonstrate particular historic characteristics described in the Historic Area Statements. One of their primary purposes is to assist development assessment by providing visual references of a particular area's character.

In the absence of any formal definition or criteria to describe Representative Buildings within the Code, GGA has developed and applied the following assessment framework (See Section 2.3 for further detail), focusing on:

- Retention of original features and material integrity;
- Clear representation of a significant architectural era or style; and
- Visual continuity with similar buildings in the streetscape.

The following acronyms and terminology have been used throughout this report.

CoA: City of Adelaide

Code: Planning and Design Code

GGA: Grieve Gillett Architects

HAO: Historic Area Overlay

HAS: Historic Area Statement

SLSA: South Australian State Library

Deputation: a verbal representation/submission

Objection: a written representation/submission

1.3 KEY RECOMMENDATIONS

The following table provides a summary of recommendations for designation as a Representative Building (or not), and referenced report sections:

Property Address	Relevant Historic Area	Recommendation	Report Section
123 Barnard Street, North Adelaide	Historic Area (Adel 1) Hill Street, North Adelaide	Not recommended	Error! Reference source not found.
171 Barnard Street, North Adelaide	Historic Area (Adel 1) Hill Street, North Adelaide	Not recommended	3.2
66 Mills Terrace, North Adelaide	Historic Area (Adel 1) Hill Street, North Adelaide	Not recommended	3.3
174 Ward Street, North Adelaide	Historic Area (Adel 6) Archer Street, North Adelaide	Recommended	3.4
112 Brougham Place, North Adelaide	Historic Area (Adel 9) Cathedral, North Adelaide	Not recommended	3.5
99 Palmer Place, North Adelaide	Historic Area (Adel 9) Cathedral, North Adelaide	Not recommended	3.6
39-40 Kingston Terrace, North Adelaide	Historic Area (Adel 12) Kentish Arms, North Adelaide	Not recommended	3.7
41, 43 Kingston Terrace, North Adelaide	Historic Area (Adel 12) Kentish Arms, North Adelaide	Not recommended	3.8
25 Mann Terrace, North Adelaide	Historic Area (Adel 12) Kentish Arms, North Adelaide	Recommended	3.9
47 Stanley Street, North Adelaide	Historic Area (Adel 12) Kentish Arms, North Adelaide	Not recommended	3.10
424 Gilles Street, Adelaide	Historic Area (Adel 14) Adelaide	Not recommended	3.11
293 Halifax Street, Adelaide	Historic Area (Adel 14) Adelaide	Recommended	3.12
301 Halifax Street, Adelaide	Historic Area (Adel 14) Adelaide	Recommended	3.13
305 + 307 Halifax Street, Adelaide	Historic Area (Adel 14) Adelaide	Recommended	3.14

This project has identified areas of the *Draft Historic Area Statement Update Report (CoA Oct24)* that may warrant further clarification, though this commentary does not constitute a formal review, and has been confirmed by the City of Adelaide as being beyond the scope of the proposed Code Amendment.

Should any recommendations be considered for adoption, further investigation and review is advised to ensure Representative Buildings adequately represent the endorsed Historic Area Statements, and the intended development outcomes under *the Code*.

2. BACKGROUND INFORMATION

2.1. TASK DESCRIPTION

This report first looks at the task of assessing Representative Buildings. Other observations and queries of the Draft Historic Area Statement Update Report (CoA Oct24) that have come to our awareness from the assessment process and our review of objections and deputations are included in Section 3 of this report, related to each specific property.

The following tasks were undertaken:

- Review of relevant background information as listed below for each property;
 - Information on the SAPPA website;
 - Information within the Draft Historic Area Statement Update Report (CoA Oct24), This is predicated on the Statements being comprehensive and based on sound research;
 - Review of historical references as noted throughout this report;
- Site inspection to all properties including understanding of surrounding context (note that site visits were only conducted from the public realm, and no property was accessed beyond the footpath);
- Review of all objection and deputation material;
- Summary of main objection points;
- Response to main objection points;
- Recommendations.

The tasks undertaken exclude assessing merits of other nominated Representative Buildings or identifying other potential suitable Representative Buildings.

The following material was reviewed:

- Audio deputations as provided by Council by email (Wed 16/04/2025, 3.01pm CCSC and CPDBA Committee Meetings, 4 March 2025 (starting at approximately 1:06 timestamp), including slide deck provided for 424 Gilles Street, Adelaide, at the deputation;
- Relevant information in the pdf document provided by Council, 22nd May 2025 entitled 'Extract – Attachment A – HistoricAreaStatement.pdf'. This included all written objections for the 16 subject properties of this report.
- The relevant sections of the following resources were read as background information and referenced if required as sources of additional information.
- Site visits to each of the properties were made, with visual inspections only – no access to the properties was made other than what was visible from the public realm.

Resources provided by Council		
Date of publication	Document Title and Author	Date Received
2024	Historic Area Statement Update Code Amendment – Report for Consultation Prepared by the City of Adelaide Online Link	Oct 2024

2005	North Adelaide Heritage PAR: Review of Objections Report to Corporation of the City of Adelaide prepared by Peter Bell	April 2025
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Other resources		
Date	Document Title, Author and information	Description
Current as of 2025	Historic Area Overlay, Design Advisory Guidelines This document is available online and was accessed through Plan SA 2025.	This Design Advisory Guideline is provided under Section 66(5) of the <i>Planning Development and Infrastructure Act 2016</i> (the Act) and assists applicants and designers to achieve design outcomes. This document was referred to for information on the <i>Code</i> , relevant terms and planning guidelines.
1880	Smith Survey Smith, H.C. Survey of the City of Adelaide, 1880. Surveyor-General's Office, Adelaide, 1880. State Library of South Australia, Map Collection.	The Smith Survey was a detailed trigonometrical survey of the city carried out from 1878 to 1880. It identifies buildings constructed before 1880

2.2. THE PLANNING AND DESIGN CODE (THE CODE)

This project deals with the assessment of 16 proposed Representative Buildings as part of a *Code* Amendment. The following information is provided to set out a background for the context of the term, 'Representative Buildings' which is unique to Historic Area Statements (and Character Area Statements) in the development assessment framework for South Australia, *the Planning and Design Code (the Code)*.

The Code came into effect on 19 March 2021, replacing all Development Plans across South Australia. The following information is from the *Historic Area Overlay Design Advisory Guidelines* which is accessible via the *Plan SA* website: [Historic Area Overlay Design Advisory Guidelines](#). These guidelines are provided under Section 66(5) of the *Planning Development and Infrastructure Act 2016* to assist applicants and designers to achieve the design outcomes.

Development in South Australia is assessed against the state-wide Planning and Design Code (the Code). The Code can be accessed on the Plan SA Portal and is an electronic database that can be searched by address or development type. The Code contains Zones, Subzones and Overlays for the assessment of development. The Overlays are of significance in that they can alter the way development applications are assessed. The Code includes an Historic Area Overlay. This Overlay includes Desired Outcomes (DO), Performance Outcomes (PO) and Historic Area Statements (HAS), which combine with the underlying zone and subzone to define the envisaged development of a local area.

2.2.1. HISTORIC AREA OVERLAYS AND HISTORIC AREA STATEMENTS

The *Historic Area Overlay Design Advisory Guidelines* explain **Historic Area Overlays** and **Historic Area Statements** as follows:

A Historic Area Overlay identifies locations that display historic themes and characteristics that are important to the local area. These attributes, identified by the relevant Historic Area Statements are often unique, and are displayed in the streetscape character of a locality. Desired and Performance Outcomes for Historic Area Overlays seek to conserve these historic attributes and for development visible from the public realm to respond contextually so as to be consistent and complementary to the identified character attributes.

Historic Area Overlay

Desired Outcome DOI: Historic themes and characteristics are reinforced through conservation and **contextually responsive design** and adaptive reuse that responds to the existing coherent patterns of land division, streetscapes, building siting, and built scale, form and features as exhibited in the Historic Area expressed in the Historic Area Statements.

Figure 1: Snippet from the Historic Area Overlay Design Advisory Guidelines

2.2.2. REPRESENTATIVE BUILDINGS

The Plan SA website defines Representative Buildings as follows:

Representative buildings referenced in Historic Area Statements and Character Area Statements and mapped in the South Australian Planning and Property Atlas are buildings which display characteristics of importance to a particular area. The identification of representative buildings in a particular area is not intended to imply that other buildings in an historic area or character area are not of importance.

Representative Buildings (formerly known as Contributory Items) are referenced in Historic Area and Character Area Statements and are mapped in the South Australian Planning and Property Atlas.

Representative Buildings display characteristics of importance in a particular area; however, their identification is not intended to imply that other buildings in a Historic or Character Area are not of importance.

Representative Buildings located within the Historic Area Overlay do have demolition control, whilst Representative Buildings located within the Character Area Overlay do not have demolition control.

The Code offers the same levels of protection for Representative Buildings as the previous planning system offered for Contributory Items.

<https://plan.sa.gov.au/resources/planning/heritage-and-character>

The *Historic Area Overlay Design Advisory Guidelines* also include the following information specific to Representative Buildings.

Design Advisory Guidelines are supported by Style Identification Advisory Guidelines. These assist applicants and designers to identify places that display the historic themes and characteristics expressed by the Historic Area Statements. It is these places that the design of new development (or additions and alterations) should contextually respond to. In some areas, these places have been identified as Representative Buildings.

Original basis for Representative buildings

The term Representative Buildings was first introduced as part of the revised draft Planning and Design Code (revised draft Code) in November 2020. The basis for this inclusion is explained in the online article titled, "Preserving South Australia's Character" Published by Plan SA 29 October 2020 and accessible via this link: [Planning and Design Code to reflect contributory items | PlanSA](#). An excerpt from this 2020 article to explain the original basis for Representative Buildings is as follows:

The State Planning Commission has announced that existing contributory items will be reflected in the revised draft Planning and Design Code (revised draft Code), ...

Contributory items are examples of buildings that contribute to the character of an area. Most contributory items are located within a Historic Area Overlay and will be afforded a level of protection due to the demolition controls that apply to that Overlay.

The revised draft Code will include changes to ensure the vast majority of existing contributory items are transitioned into the Code and individually identified under a new category, known as Representative Buildings.

In the draft Code that was released for public consultation in October 2019, the Commission proposed to remove contributory items from the new planning system because these were not defined in legislation and the way in which they have been identified and treated across the State varied from location to location.

Feedback received was overwhelmingly in support of retaining contributory items in the Code, with a strong sentiment that their removal would erode the value of these important areas.

In responding to this feedback, the Commission has elected to reflect contributory items in the draft Code using a new approach that removes existing inconsistencies in the current system and ensures consistency and clarity in the future:

- *Contributory Items will now be known as Representative Buildings*
- *Representative Buildings will be:*
 - *referred to in Historic Area Statements and Character Area Statements*
 - *mapped in the South Australian Planning and Property Atlas (SAPPA)*
- *Representative Buildings located within the Historic Area Overlay will have demolition control, consistent with all properties within this Overlay.*

Currently no Representative Buildings within the City of Adelaide

There are currently no buildings within the City of Adelaide designated as Representative Buildings. The former Adelaide (City) Development Plan did not use the term 'Contributory Items'. Instead, it included a Townscape List, which identified buildings of historic significance. These Townscape-listed buildings were transitioned to 'Local Heritage Places' under *the Code*.

Council has recognised the benefit of including Representative Buildings within Historic and Character Areas. Benefits of designating Representative Buildings include:

- Improved clarity and guidance during the development assessment process to consider the appropriateness of whether a place to be demolished and rebuilt;
- Within the development assessment process of non-listed / designated buildings, improved guidance in terms of what can be built in their place regarding appropriate scale, form, and detailing;
- Greater certainty for applicants and owners regarding development potential for specific properties.

Representative Buildings within the *Draft Historic Area Statement Update Report (CoA Oct24)*

Key factors considered in the initial nomination assessment process by CoA are listed in Section F5 of Attachment F – INVESTIGATIONS within the *Draft Historic Area Statement Update Report (CoA Oct24)* as follows:

The Proposal to Initiate included an investigation to identify Representative Buildings in the existing Historic Area Overlay as part of the scope of this Code Amendment.

These are historic buildings which are not designated as a State Heritage Place or a Local Heritage Place.

A Representative Building should exhibit significant historic themes and attributes of character based on the relevant Historic Area Statement in the Planning and Design Code. This is predicated on the Statements being comprehensive and based on sound research, which is being addressed by this Code Amendment.

For each Representative Building, an assessment of the current streetscape context and condition of each potential Representative Building as far as possible to judge from viewing for(sic) the street has been made. This occurred in conjunction with a holistic review of Historic Areas to inform a review of the Historic Area Statements.

Key factors considered in the assessment process include:

- *The building style and era should be consistent with those assessed as significant in the Historic Area as per the revised Historic Area Statement.*
- *The building demonstrates historical theme/s important in the area.*
- *For dwellings (whether converted to another use or still residential) there is visual continuity with buildings with similar characteristics in the streetscape, noting that this is a matter of fact and degree (sic) and can still occur where there is intervening development of another era in the same street or section of a street.*
- *Where there is a current valid approval for total demolition of a building.*

Commentary on Representative Buildings

The term 'Representative Buildings' is only applicable within the context of *the Code*, specifically the Historic Area Statements for the Historic Area Overlay within *the Code*. There are no defined assessment criteria or guidelines for assessing Representative Buildings. The process of undertaking this review has shown that a clear set of criteria and objectives for listing Representative Buildings within the City of Adelaide is necessary to support appropriate development assessment and more robust heritage outcomes. This is discussed further in Section 2.3: Approach.

2.2.3. DEMOLITION CONTROL

The referenced information in the above section discusses Demolition Control in relation to Representative Buildings, insofar as all buildings that are within the Historic Area Overlay are subject to demolition control. The identification of Representative Buildings is not intended to imply that other buildings in a Historic Area are not of importance. The details of the Historic Area Overlay, Performance Outcome PO7.1. are as follows:

Buildings and structures, or features thereof, that demonstrate the historic characteristics as expressed in the Historic Area Statement are not demolished, unless:

- a) the front elevation of the building has been substantially altered and cannot be reasonably restored in a manner consistent with the building's original style or*
- b) the structural integrity or safe condition of the original building is beyond reasonable repair.*

Section 'F1-Policy Context' of the *Draft Historic Area Statement Update Report (CoA Oct24)* notes the following regarding demolition control.

The Historic Area Overlay provides for the protection of buildings where demolition or other forms of development would diminish the historic value of the relevant Historic Area.

Demolition control applies to all buildings in the Historic Area Overlay. Clear protection is provided for Heritage Places (State and Local) and Representative Buildings.

It is incumbent upon applicants and planning authorities when assessing a development application in a Historic Area to consider impacts on the historic character described in a Historic Area. A starting point can be checking whether the site, if not designated as a Heritage Place, is a Representative Building.

The Code Amendment proposes to introduce Representative Buildings in the Historic Areas in the City of Adelaide via the SA Property and Planning Atlas to clarify where demolition control will be specifically considered in development assessment.

2.3. APPROACH

There are currently no defined assessment criteria or guidelines for assessing Representative Buildings. As part of the assessment of the 16 potential Representative Buildings, the following key factors were considered by GGA, in reviewing the *Draft Historic Area Statement Update Report (CoA Oct24)*:

Key factors considered in the assessment process <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>
<i>The building style and era should be consistent with those assessed as significant in the Historic Area as per the revised Historic Area Statement.</i>
<i>The building demonstrates historical theme/s important in the area.</i>
<i>For dwellings (whether converted to another use or still residential) there is visual continuity with buildings with similar characteristics in the streetscape, noting that this is a matter of fact and degree (sic) and can still occur where there is intervening development of another era in the same street or section of a street.</i>
<i>Where there is a current valid approval for total demolition of a building.</i>

To support the assessment using these key factors, assessment criteria are provided that consider building integrity and level of merit. More emphasis is also placed on the role of Representative Buildings within the Historic Areas that underpin the content of the Statements, in order to provide a reference in the streetscape that demonstrates the characteristics described.

The process for designation of Representative Buildings needs to include suitability to inform appropriate surrounding development. This is because, the main objective of Representative Buildings is to support the Historic Area Statements by guiding development assessment with representative examples. The value in having these Representative Buildings which underpin the Historic Area Statements means there is merit for retention. Designation of unsuitable Representative Buildings that do not address these objectives has the potential to cloud the Desired Outcomes of the Code. For example, if a low integrity building is listed as the only example of an era or style within the Historic Area Statement this risks applicants, designers and assessors referring to a low integrity example as the desired outcome reference.

The above reasons are provided to support our approach of defining what we consider to be appropriate criteria for the assessment of Representative Buildings.

Key factors for assessment of Representative Buildings in this report are as follows:

- Retain key original features with material integrity.
- Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.
- Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.
The main objective of Representative Buildings is to support the Historic Area Statements by guiding development assessment with representative examples. The value in having these Representative Buildings which underpin the Historic Area Statements means there is merit for retention. Greater certainty for applicants and owners regarding development potential for specific properties is also achieved.

3. SUBJECT BUILDINGS

There are 14 Historic Area Overlays within the City of Adelaide. All Historic Area Overlays reviewed in this report are within the North Adelaide suburb, except Adel 14 which is within the southeast of the Adelaide CBD.

The 16 subject buildings are within the following Historic Area Overlays:

- Adel 1, Hill Street;

- Adel 6, Archer Street;
- Adel 9, Cathedral;
- Adel 12, Kentish Arms;
- Adel 14, Adelaide.

Identification details, assessment recommendations and report sections are summarised below.

REPORT SECTION	STREET ADDRESS	REPRESENTATIVE BUILDING RECOMMENDATION
Historic Area (Adel 1) Hill Street, North Adelaide		
3.1	123 Barnard Street	Not recommended
3.2	171 Barnard Street	Not recommended
3.3	66 Mills Terrace	Not recommended
Historic Area (Adel 6) Archer Street, North Adelaide		
3.4	174 Ward Street	Recommended
Historic Area (Adel 9) Cathedral, North Adelaide		
3.5	112 Brougham Place	Not recommended
3.6	99 Palmer Place	Not recommended
Historic Area (Adel 12) Kentish Arms, North Adelaide		
3.7	39-40 Kingston Terrace	Not recommended
3.8.	41 Kingston Terrace and 43 Kingston Terrace	Not recommended
3.9	25 Mann Terrace	Recommended
3.10	47 Stanley Street	Not recommended
Historic Area (Adel 14) Adelaide		
3.11	424 Gilles Street	Not recommended
3.12	293 Halifax Street	Recommended
3.13	301 Halifax Street	Recommended
3.14	305 Halifax Street and 307 Halifax Street	Recommended

3.1. 123 BARNARD STREET, NORTH ADELAIDE

Historic Area Overlay:	Historic Area (Adel 1) Hill Street, North Adelaide
Description:	Victorian asymmetrical residence with significant alterations
Year Built:	Post 1880s - Victorian asymmetrical residence (<i>Draft Historic Area Statement Update Report (CoA Oct24)</i>)
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1837 to 1901 - Victorian period.

Images



Figure 2: 123 Barnard Street
Source: GGA 2024



Figure 3: 123 Barnard Street
Source: Bell 2005



Figure 4: 123 Barnard Street
Source: CoA dated 1976

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	123 Barnard Street retains some original features however it is visually evident from the street that it has been substantially altered, to an extent that diminishes its ability to effectively represent a single identifiable historic style.	This criterion is partially met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	As discussed above. The original overall form of the Victorian asymmetrical residence is compromised by a second storey addition, which reduces the integrity and legibility of the place.	This criterion is not met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	123 Barnard Street has a mixed character street frontage which has no visual cohesion with other dwellings in the immediate streetscape.	This criterion is not met
Assessment Summary		
123 Barnard Street is not an exemplary representation of a particular era or style that demonstrates historic character in the street. The building has been substantially altered to an extent that diminishes its ability to effectively represent a single identifiable Historic Style or Era. There is limited visual continuity with other buildings having similar characteristics.		

Review of objections / representations	
Objection documents	- Objection by owner, dated 09 Dec 2024 - Heritage Report by Douglas Alexander Architect, dated 09 Dec 2025
Deputations reviewed	None
<u>Background Information</u> - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> notes for (Adel 1), "The historic built-form character of the Area is established by State and Local Heritage Places and Representative Buildings, reinforcing the character of the historic built form, allotments and subdivision patterns as described ..." 123 Barnard Street is located between Local Heritage Listed Buildings at 117 Barnard Street and 125 Barnard Street.	
Summary of main objection points	Response to objection points
Does not represent the Historic Styles, Eras, Themes due to the extent of the renovations that occurred circa 2000 including addition of second storey with new front balcony and alterations to the roof form as well as new verandah, and modified chimneys. Walls are rendered, and the remaining sandstone is painted over.	The building has been substantially altered to an extent that diminishes its ability to effectively represent a single identifiable Historic Style, Era, or Theme.
To reverse the damage of the alterations, particularly the Upper Level would be expensive and impractical.	- The extent of modifications particularly the second storey with new front balcony cannot be easily reversed. - Whilst some modified elements could be reversed (i.e. removal of paint finish from stone walls), significant structural alterations would be very unlikely to be returned to a more original configuration.
Significant loss of character cannot be improved by removal of fencing or vegetation or replacing the verandah with modern metal connectors; removal of painting over stone walls; or rectification of unsympathetically cut off finial to the only visible villa gable etc.	- As above and changes to the landscaping to reduce the degree to which front landscaping screens the façade does not have any meaningful bearing on the remaining integrity of the dwelling. - Whilst some modified elements could be reversed (i.e. removal of paint finish from stone walls), significant structural alterations would be very unlikely to be returned to a more original configuration.
Contrast integrity between 123 Barnard Street having poor integrity compared with 125 Barnard Street which has high integrity. (125 Barnard	Agreed, 125 Barnard Street retains key original features that are not demonstrated on 123 Barnard Street such as visible stone walling, overall form, verandah style and details all with high integrity.

Street is an adjacent building which is Local Heritage Listed)	123 Barnard Street is not an exemplary representation of historic character in the street.
Loss of visual continuity in the street. No visual cohesion between 123 Barnard Street and other dwellings.	123 Barnard Street does not represent a single, identifiable historic era and style within the Historic Area Statement. 123 Barnard Street has a mixed character street frontage which has no visual cohesion with other dwellings in the streetscape.
It is somewhat erroneous and out of context to adopt favourable comments from the <i>North Adelaide Heritage PAR Review of Objections Report (Peter Bell, May 2005)</i> because the purpose of this report was to review objections to Local Heritage Listing.	- Contradicting information from the <i>North Adelaide Heritage PAR Review of Objections (Peter Bell, May 2005)</i> is referenced to support the Representative Building nomination in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>. For example, the report states that Dr Bell described the building as: “...a good example of an 1880s-1890s asymmetrical sandstone residence..” and a “typical 1880s-1890s Victorian residence displaying consistent use of typical materials such as sandstone walls, brick chimneys and front verandah”. However, the report also notes that: <i>Dr Bell also found that the house “has undergone major alteration to its form” such that there is relatively little of the existing fabric of the house dating from the nineteenth century</i> - Criteria and purpose for Local Heritage Listing is distinctly different to designation as Representative Buildings.
Not worthy of being a Representative Building. This has the potential to diminish the value placed on Representative Buildings.	Designating Representative Buildings that do not clearly demonstrate the important historic characteristics within a particular Historic Area Overlay risks undermining the objectives of this term within the <i>Planning and Design Code (the Code)</i> particularly to inform assessment of future surrounding development.
A professional review of the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> is provided addressing the intent and manner of proposed Code Amendment.	Not specific to the property at 123 Barnard Street. Refer to Section 2 for general comment.

Summary

The building has been substantially altered to the extent that it does not sufficiently demonstrate the defined characteristics to be designated as a Representative Building.

Recommendation

This building is not recommended for inclusion as a Representative Building.

3.2. 171 BARNARD STREET, NORTH ADELAIDE

Details

Historic Area Overlay:	Historic Area (Adel 1) Hill Street, North Adelaide
Description	1938 dwelling with significant alterations
Year Built:	1938 (source: SLSA B 8217)
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1920s to 1942 - Inter-War Houses

Images



Figure 5: 171 Barnard Street Source: Realestate.com Sold 2024



Figure 6: 171 Barnard Street Sept 2019
Source: Google maps



Figure 7 : Acre 802 Barnard Street, South Side April 1939.
Source SLSA B 8217

Background information

The 1939 image (above right) of the property has been sourced from the SLSA. The following description is provided with the image.

"This modest brick and render cottage has a large portico which appears as if added on later. The front fence is plain cyclone wire on wooden posts"...." This cottage was erected in 1938 on a vacant site"

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	External changes to the building including new verandah, render and painted brickwork compromise the building's integrity. 171 Barnard Street does not demonstrate key original features with material integrity.	This criterion is not met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	Due to the extent of alterations 171 Barnard Street does not represent a single identifiable era or style. Furthermore, the original materiality and form of this building demonstrated the Inter-War Austerity Style however this is not included in the description of Inter-War styles within the Historic Area Statement for (Adel 1) which focuses on Bungalow, Tudor Revival, Spanish Mission and Art Deco Modern.	This criterion is not met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	There are no other dwellings with similar characteristics in the immediate context, diminishing visual continuity within the streetscape.	This criterion is not met
Assessment Summary		
171 Barnard Street does not demonstrate key original features with material integrity. It does not represent a single identifiable era or style. There are no other dwellings with similar characteristics in the immediate context visual continuity within the streetscape.		

Review of objections / representations	
Objection documents	Objection by previous owner, dated 30 Nov 2024
Deputations reviewed	None
Review of objection documents	
<u>Background Information</u> - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> notes for (Adel 1), "The historic built-form character of the Area is established by State and Local Heritage Places and Representative Buildings, reinforcing the character of the historic built form, allotments and subdivision patterns as described ..." - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> (Adel 1) identifies Inter-War Houses (1920s to 1942) as follows: "In the period between the First World War and Second World War new styles developed, particularly the Bungalow (based on the Californian version) and Tudor Revival styles." - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> (Adel 1) proposes to change the existing HAS to include 1950's plus post war Era and description of allotments along Barnard Street.	

Summary of main objection points	Response to objection points
The property was acquired by the previous owner 10 years ago in derelict condition and it then was renovated to be rented out.	Full extent of the renovations is not detailed by the objector however it is evident that changes to the external of the building including new verandah, render and painted brickwork compromise the building's integrity. 171 Barnard Street does not retain key original features with material integrity.
The rear garden has been subdivided and incorporated into the adjoining property.	Noted, however, in this case reduction to the land at the rear of the property does not affect the consideration of streetscape character.
A similar house on the adjoining property 179 Barnard Street was previously demolished with Council approval	Records of the style and character of the former house at 179 Barnard Street have not been reviewed, and the circumstances and context within which this development was approved are outside the scope of this project. However, the removal of this property if formally similar, has resulted in 171 Barnard Street standing alongside an allotment which now contains a tennis court. There are no other dwellings with visual continuity within the streetscape.
The house was built in 1915	If this date is correct, this date places 171 Barnard Street within the Edwardian Era of the Historic Area Statement. The visually apparent style is not Edwardian nor is it Edwardian/Interwar as nominated in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>. In its current form the building represents Early Post War Austerity Style with modern finishes.

Summary

- 171 Barnard Street does not represent a single era or style consistent with those assessed as significant in the Historic Area Statement. It does not retain key original features with material integrity.

Recommendation

This building is not recommended for inclusion as a Representative Building.

3.3. 66 MILLS TERRACE, NORTH ADELAIDE

Details

Historic Area Overlay: **Historic Area (Adel 1) Hill Street, North Adelaide**

Description: **Inter-War Spanish Mission Dwelling**

Year Built: **1928/29**

Related eras, themes and context as noted in the *Draft Historic Area Statement Update Report (CoA Oct24)*: **1920s to 1942 - Inter-War Houses**

Images



Figure 8 66 Mills Terrace. Source Streetview 2024

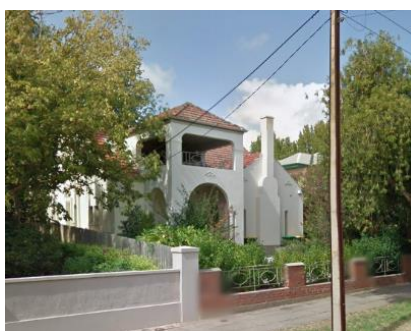


Figure 9: 66 Mills Terrace, Source Streetview, Mar 2015



Figure 10: 66 Mills Terrace, February 24th, 1930. Source : SL SA 5748

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	66 Mills Terrace demonstrates Inter-War Spanish Mission style	This criterion is met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	66 Mills Terrace demonstrates a single era and style however it is a unique style being the only building of this style in the streetscape	This criterion is partially met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	The building has no visual continuity with other buildings in the streetscape. There are no other buildings in the streetscape with similar characteristics	This criterion is not met

Assessment Summary	
66 Mills Terrace is a Spanish Mission Style dwelling. It does not meet the visual continuity criteria for Representative Building Assessment and listing this building risks confusing or diminishing the dominant character of the area which is established by the other properties (primarily of earlier defined eras) that are already Heritage Listed.	

Review of objections / representations	
Objection documents	- Report by James Hilditch, Lawyer dated 06 Dec 2024 - Report by Ron Danvers, Architect dated 04 Dec 2024
Deputations reviewed	Representation by James Hilditch, Lawyer and Ron Danvers, Architect at the CCSC and CPDBA Committee Meetings - 4 March 2025
Review of objection documents	
<u>Background Information</u> - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> notes for (Adel 1), "The historic built-form character of the Area is established by State and Local Heritage Places and Representative Buildings, reinforcing the character of the historic built form, allotments and subdivision patterns as described ..." - Report on Local Heritage Significance 1993 by Ron Danvers was submitted as an objection document (This document has been considered, however separate response to all points raised in this report is not provided below)	
Summary of main objection points	Response to objection points
The listing as a Representative Building would infer there is intrinsic value in retaining. The objection is concerned value would be incorrectly associated with this Building. Representative Buildings should be of a better quality.	- Listing as a Representative Building would infer there is intrinsic value in retaining. This is highlighted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> which notes: <i>A Historic Area without Representative Buildings creates ambiguity as to which buildings (aside from Local or State Heritage Places) have merit for retention. Designation as Representative Building confers that there is value in retention.</i> - All buildings within the Historic Area Overlay are subject to the policies of the overlay, including provisions relating to Demolition Control. - Response about value and quality are covered in the below responses.
The dominant character of the locality is comprised of Victorian Mansions.	- The subject dwelling is Spanish Mission Style. - The continuation of Mills Terrace does include a group of Victorian Mansions although a detailed survey of the entire Historic Area Overlay is beyond the scope of this report. The visual continuity of street character is apparent in the wider area, whereas the streetscape surrounding 66 Mills Terrace has a mixture of styles.
There is no visual continuity with buildings of similar characteristics in the streetscape. The subject dwelling is located amongst a	This is evident within the immediate streetscape. There is no collection of buildings, or single other building, demonstrating similar characteristics in the immediate surrounds.

small eclectic mix of styles within a locality which is otherwise comprised of Victorian Mansions.	
The building does not demonstrate historical themes important in the area.	This has been assessed as part of previous rejections of Local Heritage Listing although Historical Themes related to Local Heritage Listing are expanded beyond character style to include cultural and social themes for example.
The building has already previously been rejected for listing as a Local Heritage Place on more than one occasion. This raises concern that the advice that led to these decisions has not been adequately referenced to inform the current proposal of Representative Buildings.	It is noted that there are specific, legislated criteria for assessment and inclusion of a property as a Local Heritage Place, which do not exist for Representative Buildings. Refer to broader commentary regarding the definition and designation of Representative Buildings.
Concern with basis of nomination of Representative Building i.e. no report is presented that assesses the building as meeting a set criterion as a Representative Building.	- Noted, see the Background Information section of this report, which sets out key factors for assessment of Representative Buildings. - Assessment against a clear set of definitions and criteria ensures all buildings are assessed equally to achieve common objectives.
Concern that the information within the <i>North Adelaide Heritage PAR Review of Objections Report (Peter Bell, May 2005)</i> was not made available for comment or consultation with the owner at the time (2005). Concern that the <i>North Adelaide Heritage PAR Review of Objections Report (Peter Bell, May 2005)</i> does not assess the building against a criterion for Local Heritage Listing, 66 Mills Terrace is an example of a property that resulted in a rejection of the Local Heritage Listing and therefore the report should be rejected.	The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> does not include this background information however it references the Report at the basis of nominating many of the Representative Buildings.
Internal layouts and workings are impractical and simply do not work for family living arrangements. There are many impractical internal configurations that cannot be easily resolved.	The internal layout does not affect consideration for designation of Representative Buildings. The extent of the impractical aspects highlights implications for the owner if Representative Building status applied and inferred greater value in retention. The consideration for Representative Buildings is focused on the street character and so these concerns of the owner are acknowledged, however they do not affect our recommendations.

Poor condition of the external render and poor condition of roof.	These are elements that can be resolved with specialist trades. The extent of the condition of the elements being unmaintained, dilapidated original elements does not affect our recommendations.
Multiple burglaries have led to the requirement of the front screening/hedging for site security.	Future removal of landscaping is possible. This does not affect our recommendations.
The dwellings constructed in the 1990's to the South have negatively affected the amenity of 66 Mills Terrace and objections to the design of these dwellings were not accepted at the time.	- The specific objections to the development are not detailed, however the front setback of the dwelling to the South is less than the front setback of 66 Mills Terrace and this would impact the side-approach visibility of 66 Mills Terrace from the street. - Approval or otherwise of adjacent developments previously undertaken is outside the scope of this report
Much of the surrounding dwellings are either Local Heritage listed or modern leaving only a small number of which 2 are now proposed to be Representative Buildings.	Refer the Project Overview section of this report, which sets out key factors for assessment of Representative Buildings. The main objective if listed as a Representative Building would be to infer there is greater value in retention.

Summary

66 Mills Terrace is a Spanish Mission Style dwelling which is an era included in the *Historic Area Statement Update Report (CoA Oct24)*. The building has no visual continuity with other buildings in the streetscape. Listing this property as a Representative Building will have little purpose within the provisions of the Overlay to inform future development to the nearby allotments due to existing planning parameters that apply to these allotments. Therefore, the main objective if listed as a Representative Building would be to infer there is greater value in retention. Given Demolition Control applies to this Overlay regardless it is deemed that the assessment process should be able to ascertain appropriate assessment of any future alterations or demolition application appropriately within the current framework. 66 Mills Terrace does not meet the visual continuity criteria for Representative Building Assessment and listing this building risks confusing the dominant character of the area which is established by the other properties (primarily of earlier defined eras) that are already Heritage Listed.

Recommendation

This building is not recommended for inclusion as a Representative Building.

Additional Commentary

The review of 66 Mills Terrace as a nominated Representative Building within a streetscape where there are no other buildings of similar character brings into question the extent of this era within other streetscapes of the Historic Area Overlay (Adel 1).

The review of 66 Mills Terrace highlighted there are no Representative Buildings designations for large Victorian Mansions within the subject area (Adel1). This is notable as Victorian Mansions appear in continuity in the nearby streetscape whereas the Spanish Mission style related to 66 Mills Terrace does not have visual continuity. Listing a unique building style in a streetscape dominated by other styles within the Historic Area Statement potentially implies disproportionate importance on the nominated Representative Building.

The objection for 66 Mills Terrace raised several concerns regarding the context and use of the *North Adelaide Heritage PAR Review of Objections Report (Peter Bell, May 2005)*. One such concern was that Bell Report was prepared specifically to review objections to proposed Local Heritage Listings—an entirely different process with different objectives and assessment criteria. 66 Mills Terrace was ultimately not listed as a Local Heritage Place despite the recommendation within the Bell report to support it for Local Heritage Listing.

GGA was not involved in commissioning or disseminating the *North Adelaide Heritage PAR Review of Objections Report (Peter Bell, May 2005)* and cannot speak to its original intent. However, the *Draft Historic Area Statement Update Report (CoA Oct24)* references it without providing background—such as the report's purpose, methodology, or author qualifications. In some cases, quoted text appears to be taken out of context.

It is our interpretation that the report was paraphrasing the original Heritage Assessment that was proposed before the objection was received at the time, and that more emphasis should have been made that Dr Bell found that the house “has undergone major alteration to its form” such that “*there is relatively little of the existing fabric of the house dating from the nineteenth century*”.

3.4. 174 WARD STREET, NORTH ADELAIDE

Details

Historic Area Overlay:	Historic Area (Adel 6) Archer Street, North Adelaide
Description	Office, Former Dwelling, showing characteristics of Federation Style with alterations
Year Built:	Not confirmed "Built about the 1890s. Subsequently converted to offices" (<i>North Adelaide Heritage PAR Review of Objections Report</i> (Peter Bell, May 2005))
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	The Historic Area Statement Update Report notes the building is an Edwardian Arts and Crafts style former dwelling Edwardian Houses (1900 to 1920s)

Images



Figure 11: 174 Ward Street, GGA 2025



Figure 12: Ward Street streetscape, showing Local Heritage Place (far left) and State Heritage Place on the left, and 174 Ward Street on the right (Street View, August 2023).

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	Original elements of the building include overall form, roof pitch, masonry construction, bay windows, tall brick chimneys with expressed crowns, and timber detailing to gable end. The building has a more recent verandah.	This criterion is met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	174 Ward Street has sufficient elements to demonstrate the streetscape characteristics of the Historic Area Statement. It is part of a small group with similar buildings, to the west, one is a State Heritage Listed Place, the other is a Local Heritage Listed Place. Both heritage listed places to the West have a higher degree of material integrity including stone walling and face brickwork.	This criterion is partially met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	There is limited visual continuity in the streetscape other than the above-mentioned buildings, the surrounding streetscape is comprised of mixed styles.	This criterion is partially met
Assessment Summary		
There is limited visual continuity in the streetscape, however 174 Ward Street demonstrates sufficient characteristics and contextually relates to the adjacent listed buildings to the west.		

Review of objections / representations	
Objection documents	- Email by owner dated 03 Dec 2024 - Letter from Brian Hayes, KC, dated 28 Nov 2024 - Letter from Ron Danvers, architect, dated 25 Nov 2024
Deputations reviewed	None
Review of objection documents	
<u>Background Information</u> - The Historic Area Overlay (Adel 6) extends East to Australia Lane and West to Jeffcott Street. This Historic Area Overlay extends to incorporate the allotments behind Ward Street, on Archer Street. This Historic Area Overlay only applies to the Northern allotments on Ward Street. The allotments on the Southern side are subject to the Historic Area Overlay (Adel 5). - The HAS notes for (Adel 6): "The historic built-form character of the Area is established by State and Local Heritage Places and Representative Buildings, reinforcing the character of the historic built form, allotments and subdivision patterns as described..." and for (Adel 5) "The historic built-form character of the Area is established by State and Local Heritage Places, reinforcing the character of the historic built form, allotments and subdivision patterns as described..."	

- The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> identifies one other building in the Historic Area Overlay (Adel 6) area to be listed as a Representative Building, 104 Jeffcott Street. This is an institutional building located on an allotment containing a State Heritage Listed Place. - The surrounding allotments that are not Heritage Listed are already significantly developed to various scale, form and setbacks. Future development of the surrounding non-heritage listed properties within the Historic Area will be subjected to the development policies within the Historic Area Overlay.	
Summary of main objection points	Response to objection points
174 Ward Street is not part of a "cohort of representative buildings" nor is it part of a collection of buildings of historic character" - Mixed style typologies in the streetscape.	174 Ward Street is alongside two similar era buildings to the west, one is a State Heritage Listed Place, the other is a Local Heritage Listed Place, other than these buildings the surrounding streetscape is comprised of mixed styles. - There is limited visual continuity in the streetscape. - The Historic Area Overlay extends 100m to the west of 174 Ward Street, there are no other buildings of Historic Character to the west. There is limited visual continuity in the streetscape to the west of 174 Ward Street other than the buildings noted above.
The neighbouring building to the west retains heritage character.	- The neighbouring buildings to the west retain heritage character with a higher degree of integrity including face brickwork and stone walls, and detailing. - This is reflected in the place being listed as a State Heritage Place. - The listing of adjacent buildings does not have immediate bearing on the assessment of the subject building as a Representative Building.
Diminished character in its landscape setting.	The focus of Representative Building assessment is the integrity and character of the building. Elements such as landscape and fencing can be improved.
<u>Summary</u> There is limited visual continuity in the streetscape, however the subject building shares characteristics with the two adjacent buildings and retains sufficient integrity and stylistic characteristics.	

Recommendation
This building is recommended for inclusion as a Representative Building.

3.5. 112 BROUGHAM PLACE, NORTH ADELAIDE

Details

Historic Area Overlay:	Historic Area (Adel 9) Cathedral, North Adelaide
Description	Bluestone dwelling and boundary wall, multiple hipped roof form with side portico (front of dwelling faces away from the street)
Year built	The stone wall and portions of the building are recorded on the 1880 Smith Survey.
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	Victorian Houses (1870s to 1890s)

Images



Figure 13: 112 Brougham Place Sandstone fencing with late, Streetview, July 2020



Figure 14: South elevation of 112 Brougham Place (rear facing, away from the street). Source: CoA

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	Generally, the building incorporates Victorian Era characteristics however its configuration is not typical and is not evident from the street.	This criterion is partially met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	Whilst the dwelling when viewed from the south demonstrates characteristics of the Victorian style, the siting (on the street boundary) and orientation of the dwelling (fronting the rear boundary) do not allow visibility of these features, and the streetscape presentation does not align with the established streetscape character.	This criterion is partially met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	There is no visual continuity with other buildings having similar characteristics in the streetscape.	This criterion is not met
Assessment Summary		
The building incorporates Victorian Era characteristics however the siting and orientation of the building is not typical and its visibility from the street is obscured. Substantial renovations and limited visibility to the street due to orientation means there is no meaningful value as a Representative Building.		

Review of objections / representations	
Objection documents	- Letter from owner, dated December 2024 - Letter from owner, dated Nov 2004 - Owner mark up of the McDougall & Vines 2004 Citation
Deputations reviewed	None
Review of objection documents	
<u>Background Information</u> - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> notes for Historic Area Overlay (Adel 9), "The historic built-form character of the Area is established by State and Local Heritage Places and Representative Buildings, reinforcing the character of the historic built form, allotments and subdivision patterns as described ..." - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> identifies one other building in the Historic Area Overlay (Adel 9) area to be listed as a Representative Building, 99 Palmer Place.	
Summary of main objection points	Response to objection points
Substantial renovations have resulted in the only remaining elements from the earliest	112 Brougham Place has limited key original features with material integrity.

period of development are the western section of the street wall.	
Inaccuracies in a letter by Council 10th Oct 2024 regarding position of the property and view of property from the street.	- The position (on the street boundary) and orientation of the dwelling (fronting the rear boundary) does not align with the established streetscape character. - The is no visual continuity with other buildings having similar characteristics in the streetscape.
Previous objection to Listing the property as a Local Heritage Place (2004) and the heritage significance of the property being dismissed by the Environment Court (2000).	The previous matters regarding objection to Local Heritage Listing and dismissal by the Environment Court have been considered as background information.
<u>Summary</u> Substantial renovations and limited visibility to the street due to orientation means there is no meaningful value as a Representative Building.	

Recommendation
This building is <u>not</u> recommended for inclusion as a Representative Building.

3.6. 99 PALMER PLACE, NORTH ADELAIDE

Details

Historic Area Overlay:	Historic Area (Adel 9) Cathedral, North Adelaide
Description	Former austere asymmetrical dwelling, substantially altered to display features of a grand symmetrical Victorian House.
Year Built:	Originally built 1882, altered in 1987
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1837 to 1901 - Victorian period.

Images



Figure 15: 99 Palmer Place
Source: Google Maps, Jun 2021



Figure 16: 99 Palmer Place dated 1976
Source: City of Adelaide

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	The building was substantially altered in 1987. Most features displayed to the street are later alterations in the style of a symmetrical Victorian House. Remaining original features are not legible.	This criterion is not met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	The building presents to the street as an intact symmetrical Victorian House however this is not the case. The presentation to the street is the result of <u>mixed eras of construction</u> .	This criterion is not met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	99 Palmer Place presents with Victorian characteristics that are also present in the streetscape however the integrity is low as the characteristic elements have been applied to an earlier building of a different style. See the 1976 photo above of the original street frontage.	This criteria is not met.

Assessment Criteria	Review	Assessment
Assessment Summary		
The symmetrical façade to 99 Palmer Place is the result of major alterations which occurred in 1987. These works completely altered the configuration and style of the building. The current house represents a building which is grander than the original. Designation as a Representative Building is not appropriate as this would misrepresent the historic development pattern of the area.		

Review of objections / representations	
Objection documents	- Letter by Griffins Lawyers, dated 09 December 2024 - Heritage Report by Dash Architects, 09 December 2024
Deputations reviewed	None
Review of objection documents	
<u>Background Information</u> - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> notes for (Adel 9), "The historic built-form character of the Area is established by State and Local Heritage Places and Representative Buildings, reinforcing the character of the historic built form, allotments and subdivision patterns as described ..." - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> identifies one other building in the (Adel 9) area to be listed as a Representative Building, 112 Brougham Place.	
Summary of main objection points	Response to objection points
The dwelling was substantially remodelled in 1987. These renovations saw majority of the front façade demolished and extended to the north, providing a new central entrance (to replace the original side entrance). A new bay window to the left side of the frontage. Door and windows replaced or replicated. The Front verandah was altered, and the chimney locations were altered.	- There is sufficient evidence that the building no longer represents its historic form. - The building does not retain key original features with material integrity.
The 1987 renovations also saw the front fence replaced and reconfigured to provide a central entrance to the property.	A photograph dated 1976 (provided above) sourced from Adelaide City Council (City of Adelaide) provides further evidence of this.
It stands as a historically inaccurate representation of an era of development from another locality.	Listing a 1980's reproductive style would misrepresent the historic development pattern of the Area.
Further discussion includes implications for Performance	This has been considered, additionally all buildings within the Historic Area Overlay remain subject to the

Outcomes and outlines an avenue for demolition.	policies of the overlay, including provisions relating to Demolition Control.
Previous similar objections 1993 and 2005 were dismissed based on evidence that has not changed causing concern and expense to the owner.	Previous similar objections based on unchanged evidence is considered as background information.
<u>Summary</u> Extensive alterations to the dwelling's frontage in 1987 significantly compromise its historical integrity, making it unsuitable as a Representative Building.	

Recommendation
This building is <u>not recommended</u> for inclusion as a Representative Building.

3.7. 39-40 KINGSTON TERRACE, NORTH ADELAIDE

Details

Historic Area Overlay:	Historic Area Overlay (Adel 12), Kentish Arms
Description:	Mixed era dwellings that have been amalgamated as one dwelling with Early Victorin, Old English Revival, and American Colonial Revival influences
Year Built:	Mixed eras, significantly altered in the 1940's. A small house of similar scale is visible on the Smith Survey of 1880, and additions have been undertaken over time.
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	Post-WWII house with Old English Revival and American Colonial Revival influences

Images



Figure 17: 39-40 Kingston Terrace. Source: Google Street View



Figure 18: Photographed 1982; SLSA B 40194



Figure 19: Photographed 1982; SLSA B 40196

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	While some of the early fabric may remain, the dwelling as viewed from the street displays a mix of eras and styles.	This criterion is partially met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	39-40 Kingston Terrace displays a mix of styles and eras. It does not exemplify a single era and style of construction consistent with those identified as significant in the Historic Area Overlay (as defined in the Historic Area Statement).	This criterion is not met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	There is no visual continuity with other buildings having similar characteristics in the streetscape. The immediate context is varied.	This criterion is not met
Assessment Summary		
The mix of eras and styles demonstrates a mix of post-War influences in the area; the overall composition of the building is not representative of a single style. Decorative features are of old English and American Colonial revival while the form is derived from the repurposing of two original attached dwellings with two-storey extension.		

Review of objections / representations	
Objection documents	- Letter by Owner dated 04 Dec 2024; - Report by Stevens Architects dated 04 Dec 2024; - Agenda Item no. 1- Attachment 3 pdf; - Letter from Mr. Andrew Stevens, director of Stevens Architects, dated 29 November 2004; <i>North Adelaide Heritage PAR Review of Objections Report (Peter Bell, May 2005).</i>
Deputations reviewed	None
Review of objection documents	
<u>Background Information</u> The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> notes for Historic Area Overlay (Adel 12), "The historic built-form character of the Area is established by Heritage Places and Representative (Buildings), reinforcing the character of the historic built form, allotments and subdivision patterns as described below: ..."	
Summary of main objection points	Response to objection points
Listing as a Local Heritage Place was rejected in 2004. Much of the 2004 objection remains relevant.	The 2004 documents are considered as background information. The objection addresses the nomination for Representative Building as a separate matter as outlined in the summary below.

It is not of a building style and era consistent with those assessed as significant in the Historic Area Statement.	39-40 Kingston Terrace displays a mix of styles and eras. It does not exemplify a single era and style of construction consistent with those identified as significant in the Historic Area Overlay (as defined in the Historic Area Statement).
Does not display visual continuity with buildings with similar characteristics in the streetscape.	There is no visual continuity with other buildings having similar characteristics in the streetscape. The immediate context is varied.
Does not demonstrate historical themes important in the area	The low integrity of the building makes it difficult to identify era of construction and therefore is not able to clearly demonstrate relevant historic themes.
- The building has no integrity to represent a single style. - The building comprises what were formerly two attached dwellings but has been converted into a single dwelling. The dwelling is a combination of styles with substantial alterations over time including upper storey addition, rendering, reframing of roofs and tiling of roofs, window frames, shutters etc are all non-original. - The single storey section appears to be what remains of a simple workers cottage of the mid-1800s, albeit now in a much-altered state. - The attached, two-storey section, dates from the late 1940's but also includes substantial alterations and additions from the 1970's and 1980's, may also include remnants of fabric associated with an early workers cottage although if this is the case, it is difficult to interpret.	The lack of integrity due to composition and substantial alterations is evident from the street. The objection provides useful detail regarding the development sequence of the alterations.
The two-storey addition was constructed in 1948 which is outside the Interwar period 1920s to 1942	Noted, outside the defined period.
The alterations affecting building integrity cannot be easily reversed. The hard cement-rich render is adversely affecting the original masonry which is damaged by moisture.	Whilst items such as the use of cement-based mortar could potentially be reversed, the extent and nature of these modifications collectively have resulted in the loss of significant original fabric and architectural detail which cannot be easily reversed.
<u>Summary</u>	

- The overall composition of the building is not representative of a single, clearly identifiable style. The building has been substantially altered to the extent that it is not recommended to be listed as a Representative Building.

Recommendation

This building is not recommended for inclusion as a Representative Building.

Additional Commentary

Inter-War Old English Revival Style within (Adel 12) The review of 39-40 Kingston Terrace as a nominated Representative Building within a streetscape where there are no other buildings of similar character brings into question the extent of this era within other streetscapes of the Historic Area Overlay (Adel 12).

3.8. 41 KINGSTON TERRACE AND 43 KINGSTON TERRACE, NORTH ADELAIDE (TWO PROPERTIES)

Details

Historic Area Overlay:	Historic Area Overlay (Adel 12), Kentish Arms
Description:	Victorian Symmetrical Semi-Detached Residences with Georgian Revival alterations
Year Built:	Originally built in the 1837 to 1901 - Victorian period with Façade alterations.
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1837 to 1901 - Victorian period.

Images

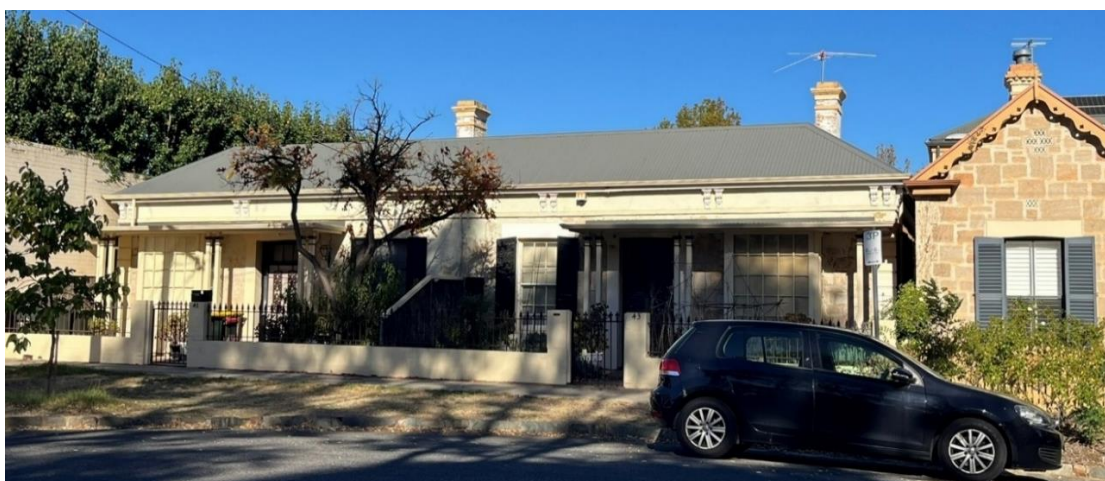


Figure 20: (L to R) 41 and 43 Kingston Terrace; GGA, 2025



Figure 21: Streetscape of the corner of Kingston Terrace; Aug 2020
Source: Google maps

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	Some of the original Victorian material remains however the integrity is compromised by alterations to windows, rendered wall and porches in Georgian Revival Style. The extent of these alterations is not easily reversible.	This criterion is partially met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	Alterations result in the buildings presenting as a combination of styles. They do not represent a single era or style.	This criterion is not met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	The building presents a shallow front setback and single storey scale characteristic of the Area Statement; However, there is no limited visual continuity with other buildings having similar characteristics in the immediate streetscape.	This criterion is partially met
Assessment Summary		
The remaining original fabric is not legible and is compromised by alterations, therefore integrity is low. Alterations result in these buildings having a combination of styles and eras. There is limited visual continuity with other buildings having similar characteristics in the streetscape.		

Review of objections / representations	
Objection documents	- Letter from David Davies, owner, dated 4 December 2024 - Report by Andrew Stevens, Stevens Architects, dated 4 Dec 2024 - Letter from Andrew Stevens, Stevens Architects Pty, dated 29 Nov 2004 - Extract of the North Adelaide Heritage PAR: Review of Objections, 2005, Peter Bell citation
Deputations reviewed	None
Background Information - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> notes for Historic Area Overlay (Adel 12), "The historic built-form character of the Area is established by Heritage Places and Representative (Buildings), reinforcing the character of the historic built form, allotments and subdivision patterns as described below: ..." 41 and 43 Kingston Terrace are outlined in the 1880 Smith Survey. This supports the likelihood that these properties were originally 1870's Victorian era symmetrical cottages. - Neighbouring 44, 45, 48 Kingston Terrace buildings are all Local Heritage Places.	

Review of objection documents	
Summary of main objection points	Response to objection points
Listing as a Local Heritage Place was rejected in 2004.	The 2004 documents are considered as background information. The objection addresses the nomination for Representative Building as a separate matter as outlined in the summary below.
<u>Loss of integrity.</u> Significant alterations undertaken in 1965, including: Removal of side windows – Addition of projecting bay windows at the front; – Demolition of original verandah and construction of new porch with new flooring; – Installation of new front door and glazing; – Removal of one fireplace each from 41 and 43; – Internal, rear, and fencing modifications.	- Alterations result in the building presenting as a combination of styles which weakens its representation of a specific style or period. 41 and 43 Kingston Terrace do not exemplify a single identifiable era and style of construction consistent with those identified as significant in the Historic Area Overlay.
<u>Alterations are not easily reversible:</u> -New windows have replaced original front masonry, resulting in the loss of rendered reveals; -Use of inappropriate construction techniques (e.g., hard cement mortar); -Porch cut into and fixed to original stonework.	Whilst items such as the use of cement-based mortar could potentially be reversed, the extent and nature of these modifications collectively have resulted in the loss of significant original fabric and architectural detail which cannot be easily reversed.
Concern that out-of-context comments from the <i>North Adelaide Heritage PAR Review of Objections Report</i> (Peter Bell, May 2005) (or query a 2006 document is referenced in the Amendment Report) have been supplemented with favourable opinion from CoA as reason to list these buildings in the Draft <i>Historic Area</i>	Some elements of the original form of these buildings remains however the original style and form of these buildings as viewed from the street is not 'reasonably intact', as summarised by the objection.

<i>Statement Update Report (CoA Oct24)</i> which states: <i>Despite façade alterations in 1965, more particularly, larger windows and porches in neo-Georgian style (Bell, 2006), the original form of the building as viewed from the street is part of a row of earlier dwellings that is reasonably intact.</i> As background the objection provides examples where Peter Bell went on to state <i>"As a result of these alterations, the house is no longer characteristic of houses of the period, and has lost its original aesthetic merit"</i> And <i>"These houses are no longer "excellent examples of 1870s-1880s symmetrically fronted sandstone residences". They were modernised in the 1960s to become Georgian revival buildings. Only a small proportion of the fabric of the original houses survives.</i>	
Mixed streetscape character. Inaccurate to describe the dwellings as part of a row of earlier dwellings.	There is no visual continuity with other buildings having similar characteristics in the immediate streetscape.
The historic development of North Adelaide as a residential village and the continued residential nature of the suburb is well-represented in the existing State and local heritage places and proposed Representative Buildings with significantly higher	Noted, but does not inform the assessment of the subject properties for designation as a Representative Building (or not)

integrity than the subject dwellings.	
<u>Summary</u> The remaining original fabric is not legible and is highly compromised by alterations, therefore integrity is low. Alterations result in these buildings having a combination of styles such that they are not recommended as a Representative Buildings.	

Recommendation
These buildings are <u>not recommended</u> for inclusion as Representative Buildings.

3.9. 25 MANN TERRACE, NORTH ADELAIDE

Details

Historic Area Overlay:	Historic Area Overlay (Adel 12), Kentish Arms
Description:	Late nineteenth century symmetrical masonry house, with later brick and iron fence.
Year Built:	Built after 1880 (not in Smith Survey).
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1837 to 1901 - Victorian period.

Images

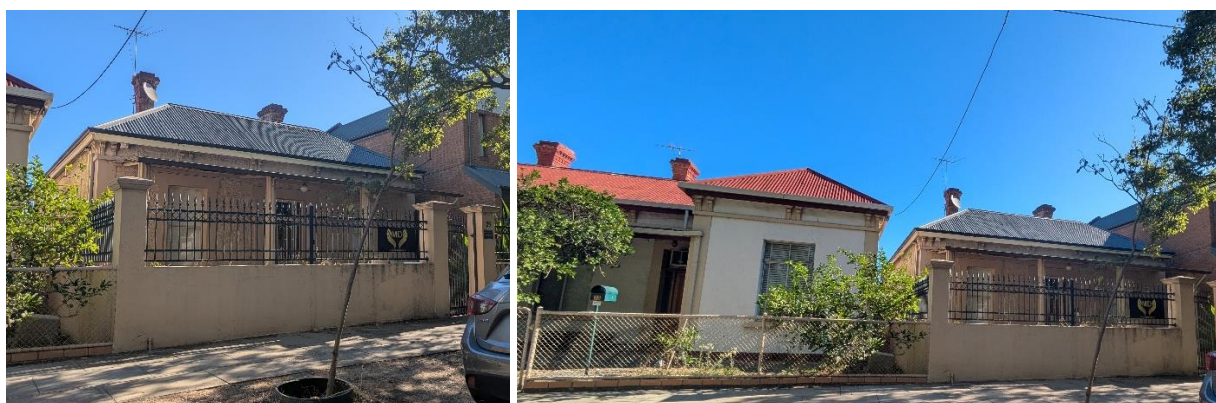


Figure 22: 25 Mann Terrace, GGA 2025 Figure 23: 25 Mann Terrace (right), and adjacent LHP (left), GGA 2025

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	Retaining key elements such as rendered quoins, window and door facings, and eaves brackets. Masonry walling remains however it has been painted over.	This criterion is partially met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	Whilst the integrity of the dwelling is compromised by alterations including replaced verandah, it retains characteristics including overall form, roof pitch, chimneys, symmetrical frontage, vertically proportioned windows reflective of its Victorian era construction.	This criterion is met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the	There is visual continuity in the streetscape with other nearby buildings including some Local Heritage places.	This criterion is met

Assessment Criteria	Review	Assessment
same character within the streetscape.		
Assessment Summary		
Victorian era characteristics are demonstrated by the subject dwelling which retains a level of integrity and consistency in the streetscape.		

Review of objections / representations	
Objection documents	Email by owner dated 5 December 2024
Deputations reviewed	None
Review of objection documents	
<u>Background Information</u> - The Draft Historic Area Statement Update Report (CoA Oct24) notes for Historic Area Overlay (Adel 12), "The historic built-form character of the Area is established by Heritage Places and Representative (Buildings), reinforcing the character of the historic built form, allotments and subdivision patterns as described below: ..." 23 and 21-22 Mann Terrace to the south of subject property are Local Heritage Places.	
Summary of main objection points	Response to objection points
Lack of Historical or Architectural Significance with alterations over the years to façade, verandah and fencing. No longer retains distinct historical features,	- Some of the original forms exists; the current integrity is compromised by modifications. However, modified elements could be reversed including removal of paint finish from stone walls, and replacement of verandah and fencing.. - Key original features have moderate material integrity.
Ongoing deteriorating property condition. The owner has concerns about restrictions to carry out necessary repairs and modifications.	- The condition of a place should not be a factor for consideration in the assessment and does not influence the assessment of Representative Buildings. - Refer also additional commentary below.
Impact on property value. The listing restricts alterations and renovations which reduces marketability and overall value.	Listing as a Representative Building would mean there is merit for retention however alterations to Representative Buildings are common and there is a framework for planning assessment in place. The property is already subject to the Desired Outcomes assessment criteria for the Heritage Area Overlay including demolition control.
Personal and Financial Impact. The potential for decreased property value and diminished flexibility in managing the property is a major concern.	This is addressed in the above comment.

Summary

Whilst subject to modifications, 25 Mann Terrace retains sufficient integrity such that it is recommended to be listed as a Representative Building.

Recommendation

This building is recommended for inclusion as a Representative Building.

Additional Commentary

Review of 25 Mann Terrace highlighted there may have been insufficient information provided to nominated Representative Building owners regarding implications for future works planning and incentive schemes if applicable to assist with maintaining the displayed characteristics of Representative Buildings.

If this is the case, concerns by owners may be addressed by providing clear information on the future provision of any incentive schemes that will be applicable for Representative Buildings or other opportunities for funding, advice and other assistance to owners who may not be aware of what is available.

3.10. 47 STANLEY STREET, NORTH ADELAIDE

Key Details

Historic Area Overlay:	Historic Area Overlay (Adel 12), Kentish Arms
Description:	Victorian Style Simple Workers Cottage with significant alterations
Year Built:	Not confirmed, however the building's outline appears in the 1880 Smith Survey.
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1837 to 1901 - Victorian period.

Images:



Figure 24: 47 Stanley Street Source: GGA 2025



Figure 25: Streetscape context of 47 Stanley Street (centre, red roof), July 2023 Source: Google maps

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	Whilst the original form remains, the extent of early / original fabric is not legible due to alterations that are not typical of Victorian Cottage characteristics	This criterion is not met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	Ability to exemplify defined character is compromised by alterations including heavily rendered walls, verandah profile, and roof profile.	This criterion is not met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	There is some visual continuity due to reproduction elements from later alterations. Immediate streetscape consists of a heritage place to the west and newer dwellings to the east, both exhibiting varying visual character. Within the broader streetscape character, 47 Stanley Street aligns with the Draft Historic Area Statement, which describes "<i>closely sited single-storey detached and semi-detached dwellings with small setbacks from the street frontage and small front garden areas established by the Heritage Places.</i>"	This criterion is met.
Assessment Summary		
The extent of early / original fabric is not legible due to alterations that are not typical of Victorian Cottage characteristics.		

Review of objections / representations	
Objection documents	- Email from Michele Slatter, co-owner dated 8 Dec 2024 - Report by APS Alston and MM Slatter, dated 8 Dec 2024 <i>North Adelaide Heritage PAR Review of Objections Report (Peter Bell, May 2005)</i>
Deputations reviewed	Representation by Michele Slatter, co-owner, at the CCSC and CPDBA Committee Meetings - 4 March 2025
Review of objection documents	
Background Information The Draft Historic Area Statement Update Report (CoA Oct24) notes for Historic Area Overlay (Adel 12), "The historic built-form character of the Area is established by Heritage Places and Representative (Buildings), reinforcing the character of the historic built form, allotments and subdivision patterns as described below: ..."	

Summary of main objection points	Response to objection points
The building's date of origin is uncertain, with no clear consensus on the age of its earliest remnants. McDougall and Vines suggested it dates between 1860 and 1870, a view Bell considered inconsistent, while real estate sources indicate it began in the 1880s.	- The building's outline appears in the 1880 Smith Survey. - Whilst the original form remains, the extent of early / original fabric is uncertain due to alterations that are not typical of Victorian Cottage characteristics
The building no longer displays characteristics of importance to the Historic Area Overlay.	- The extent of modifications including heavily rendered walls, verandah profile, roof profile, results in an inability to exemplify a single clearly identifiable era and style of construction. - The original key features are not retained with high integrity.
The objection notes that character and integrity was dismissed by Bell in 2005 and since then a further series of major alterations were undertaken and more changes were made to the building's façade.	Addressed in the responses above.
The character and context are well-protected by the numerous Heritage Places' influence and by the Kentish Arms Historic Area heritage controls without additional 'Representative Buildings'.	It is agreed that there are numerous properties afforded protection via Local and State listing, however this does not influence the assessment of the specific subject property.
Its selection as the sole nominated Representative Building from Stanley Street North Adelaide raises significant questions about the nomination process.	Designating Representative Buildings that do not clearly demonstrate the important historic characteristics within a particular Historic Area Overlay risks undermining the objectives of this term within the <i>Planning and Design Code (the Code)</i> particularly to inform assessment of future surrounding development.
Summary	
Low integrity of the building fabric and inability to demonstrate a single clearly identifiable era or style result being unsuitable to be recommended as a Representative Building.	

Recommendation

This building is not recommended for inclusion as a Representative Building.

3.11. 424 GILLES STREET, ADELAIDE

Details

Historic Area Overlay:	Historic Area Overlay (Adel 14), Adelaide
Description:	Tudor Revival and Bungalow Residence
Year Built:	1925 (via <i>Draft Historic Area Statement Update Report</i> , CoA Oct24)
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report</i> (CoA Oct24)	1920s to 1942 Inter-War Houses.

Images



Figure 26: 424 Gilles Street GGA, 2025



Figure 27: 424 Gilles Street with garage addition, CoA

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	Some original features remain; however, the overall integrity has been compromised by alterations including altered window openings, additional carport under main roof, and second storey addition.	This criterion is not met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	The building does not exemplify a single era or style; it displays a mix of Tudor Revival and Modern Bungalow styles.	This criterion is not met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	424 Gilles Street has a mixed character street frontage which has no visual cohesion with other dwellings in the immediate streetscape.	This criterion is not met

Assessment Criteria	Review	Assessment
Assessment Summary		
Low integrity due to alterations results in presentation of mixed era styles. No visual continuity with other buildings having similar characteristics in the streetscape.		

Review of objections / representations	
Objection documents	Report by Peter Psaltis, Planning Environment Lawyer, dated 12 December 2024
Deputations reviewed	- Representation by David Billington SC, Barrister, Howard Zelling Chambers, at the CCSC and CPDBA Committee Meetings - 4 March 2025 - Slide deck presented by David Billington SC, Barrister, for the CCSC and CPDBA Committee Meetings - 4 March 2025
Review of objection documents	
Background Information - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> notes for (Adel 14), "The historic built-form character of the Area is established by State and Local Heritage Places and Representative Buildings, reinforcing the character of the historic built form, allotments and subdivision patterns as described ..." - The <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> for (Adel 14) identifies Inter-War (1920s to 1942) styles include: Bungalow, Tudor Revival, Spanish Mission and Art/Deco Modern.	
Objection to Interwar Era inclusion in the Historic Area Statement for (Adel 14)	
Summary of main objection points	Response to objection points
An adequate foundation has not been laid for including the Inter-war period in the Historic Area Statement in the first place.	The inclusion of the Inter War era has resulted in the nomination of 424 Gilles Street as a Representative Building. It is valid to query the basis of the inclusion of the era foremost.
- The objection outlines the sequence of procedures that have led to the current (not proposed Amendment) Historic Area Statement. <i>The Planning and Design Code (The Code)</i> commenced in operation in 2021. Historic Area Statements were included to replace Desired Character Statements in the former <i>Development Plan</i>. The Statements were based on the former <i>Development Plan</i> content. -The draft Historic Area Statement for (Adel 14) [this	- There is potentially valid concern if the inclusion of the Inter-War period in the Code by the State Government (2021) occurred for reasons which remain undocumented and unexplained, without appropriate rigour or public scrutiny. - There is validity in requiring sound justification for including this period in the first place before amendments can be considered. - Investigations and analysis for including this era are not included in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i> - noting that this was a State Government decision.

is prior to 2021] was released for public consultation. <i>This was faithful to the SHV [Statement of Heritage Value] in so far as it referred to 'cohesive groups of nineteenth century buildings' while making no mention whatsoever of the inter-war period. (objection material)</i> <i>-However, by the time the Code went live in March 2021, the HAS [Historic Area Statement] (Adel 14) has been amended to include passing references to the Inter-War period, under the headings 'Eras, themes and context' and 'Materials'... Notably, such references... did not relate to Gilles Street, but were generic in nature.</i>	
There is a scattering of Representative Buildings of this Era nominated as part of the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>. This demonstrates or hardly screams out as being an important era of building.	This suggests that this era may not exist with visual continuity in any streetscape except Allen Place. Further research and interrogation of the number and integrity of Inter War era buildings would be required to make a determination.
Recommendation regarding Inter-War Era	
The objection raises potentially valid concern regarding the procedures that led to the inclusion of the Inter-War Era in the current <i>Code</i>. There is validity in requiring sound justification for including this period before amendments can be considered.	

Objection to Representative Building	
Further to points raised objecting to the inclusion of the Inter-War Era, even if the Inter-War period has been properly included, the building has been modified, which modifications have compromised integrity.	The building does not exemplify a single era or style; it displays a mix of Tudor Revival and Modern Bungalow styles. Any representation of character is also diminished by modifications including altered window openings, second storey addition, and much later leadlight glazing.
The building is not representative of dwellings of the Inter-War period; rather, it is an atypical example which does not represent relevant attributes of the Inter-War	As discussed above.

period as identified in the Historic Area Statement.	
The character described for Gilles Street in the Historic Area Statement does not include Inter-War Style.	Noted, refer to commentary above about inclusion of Inter War era buildings in the Historic Area Statement.
Summary The building does not exemplify a single clearly identifiable era or style. Any representation of character is also diminished by modifications such that it is not suitable to be recommended as a Representative Building. Inclusion of the Inter-War style should be pending further investigations as recommended.	

Recommendation
424 Gilles Street is <u>not recommended</u> for inclusion as a Representative Buildings.

Additional Commentary
Inter-War Era (Adel 14) requires further investigation Council received a deputation and objection to the nomination of 424 Gilles Street, and this was submitted with an objection to the inclusion of the Inter-War era in the Historic Area Statement for Historic Area Overlay (Adel 14). The objection to the inclusion of the Inter-War era in (Adel 14) raises queries regarding the basis for the inclusion of the Inter-War Era within the current <i>Code</i>. The objection claims that information justifying the inclusion of the Inter-War period was not released for consultation within drafts of <i>the Code</i> before it appeared in the implemented <i>Code</i> in 2021. The objection should be read in full for context.

3.12. 293 HALIFAX STREET, ADELAIDE

Key Details

Historic Area Overlay:	Historic Area Overlay (Adel 14), Adelaide
Description:	Victorian Style, Symmetrical Dwelling
Year Built:	Not known
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1837 to 1901 - Victorian period.

Images



Figure 28: 293 Halifax Street
Source: GGA, 2025



Figure 29: Halifax Street, South, Streetscape
Source: Google maps

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	293 Halifax Street retains intact architectural features including hipped roof, tall brick chimneys, pitched verandah, vertically proportioned windows with brick reveals, and stone masonry walls and brick quoins.	This criterion is met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	The building displays typical characteristics of a Victorian cottage. Halifax Street (east of Hutt Street) is identified as having a 'Victorian Period' Architectural style.	This criterion is met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	293 Halifax Street contextually sits with the surrounding streetscape, as a single-storey, low scale cottage with a shallow front setback, small garden area, and minimal side boundary setbacks. There is visual continuity with surrounding dwellings having similar characteristics on Halifax Street.	This criterion is met
Assessment Summary		
293 Halifax Street displays key original features consistent with architectural elements commonly found in Victorian era, cottage dwellings. It is a good example of this style and era and has visual continuity with other buildings having similar characteristics in the streetscape.		

Review of objections / representations	
Objection documents	Letter from Luisa Manno, owner, 6 December 2024
Deputations reviewed	None
Summary of main objection points	Response to objection points
No noteworthy, famous or distinguished person is connected to the properties.	This is not a consideration for Representative Buildings. This does not affect assessment.
The properties have neither, Museum nor Art Gallery importance.	As per above
The properties have been in family ownership and the integrity of the family should be considered.	As per above
Concern that civil rights are being encroached on.	Comment on this is beyond the scope of this project.
Summary The objector has concerns that do not affect assessment of Representative Buildings.	

Recommendation
293 Halifax Street is <u>recommended</u> for inclusion as a Representative Buildings.

3.13. 301 HALIFAX STREET, ADELAIDE

Details

Historic Area Overlay:	Historic Area Overlay (Adel 14), Adelaide
Description:	Victorian Style, Symmetrical Dwelling
Year Built:	Outline of the dwelling is evident in the 1880 Smith Survey.
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1837 to 1901 - Victorian period.

Images



Figure 30: 301 Halifax Street
Source: GGA, 2025



Figure 31: Halifax Street Streetscape
Source: GGA, 2025

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	301 Halifax Street architectural features include hipped roof, tall brick chimneys, pitched verandah, vertically proportioned windows with rendered reveals, and stone masonry walls and quoins.	This criterion is met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	The building displays typical characteristics of Victorian Cottages. Halifax Street (east of Hutt Street) is identified as having a 'Victorian Period' Architectural styles.	This criterion is met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	301 Halifax Street contextually sits with the surrounding streetscape, presenting as a single-storey, low scale cottage with a shallow front setback, small garden areas, and minimal side boundary setbacks. There is visual continuity with surrounding dwellings having similar characteristics on Halifax Street.	This criterion is met
Assessment Summary		
301 Halifax Street displays key original features consistent with architectural elements commonly found in Victorian era, cottage dwellings. It is a good example of this style and era and has visual continuity with other buildings having similar characteristics in the streetscape.		

Review of objections / representations	
Objection documents	Letter from Luisa Manno, owner, 6 December 2024
Deputations reviewed	None
Summary of main objection points	Response to objection points
No noteworthy, famous or distinguished person is connected to the properties.	This is not a consideration for Representative Buildings. This does not affect assessment.
The properties have neither, Museum nor Art Gallery importance.	As per above
The properties have been in family ownership and the integrity of the family should be considered.	As per above
Concern that civil rights are being encroached on.	Comment on this is beyond the scope of this project.
Summary The objector has concerns that do not affect assessment of Representative Buildings.	

Recommendation
301 Halifax Street is <u>recommended</u> for inclusion as a Representative Building.

3.14. 305 AND 307 HALIFAX STREET (TWO PROPERTIES)

Details

Historic Area Overlay:	Historic Area Overlay (Adel 14), Adelaide
Description:	Victorian Semi-Detached Dwellings
Year Built:	Outline of the dwellings is evident in the 1880 Smith Survey.
Related eras, themes and context as noted in the <i>Draft Historic Area Statement Update Report (CoA Oct24)</i>	1837 to 1901 - Victorian period.

Images



Figure 32: 305 and 307 Halifax St; Source: Google Maps, Aug 2024



Figure 33: Semi-detached dwellings continue the scale and form of nearby houses: GGA, 2025.

2025 Representative Buildings Assessment

Assessment Criteria	Review	Assessment
i. Retain key original features with material integrity.	305 and 307 Halifax Street architectural features include hipped roof, tall brick chimneys, pitched verandah, vertically proportioned windows, and stone masonry walls and quoins.	This criterion is met
ii. Exemplify a single era and style of construction consistent with those assessed as significant in the Historic Area Overlay as per the Historic Area Statement.	The buildings display typical characteristics of Victorian Cottages. Halifax Street (east of Hutt Street) is identified as having a 'Victorian Period' Architectural styles.	This criterion is met
iii. Visual continuity with other buildings having similar characteristics in the streetscape. There should be a collection of buildings of the same character within the streetscape.	305 and 307 Halifax Street contextually sit with the surrounding streetscape, presenting as a single-storey, low scale cottage with a shallow front setback, small garden areas, and minimal side boundary setbacks. There is visual continuity with surrounding dwellings having similar characteristics on Halifax Street.	This criterion is met
Assessment Summary		
305 and 307 Halifax Street display key original features consistent with architectural elements commonly found in Victorian Era, Semi Detached Dwellings. These dwellings are a good example of this style and era and they have visual continuity with other buildings having similar characteristics in the streetscape.		

Objection documents	Letter from Luisa Manno, owner, 6 December 2024
Deputations reviewed	None
Summary of main objection points	Response to objection points
No noteworthy, famous or distinguished person is connected to the properties.	This is not a consideration for Representative Buildings. This does not affect assessment.
The properties have neither, Museum nor Art Gallery importance.	As per above
The properties have been in family ownership and the integrity of the family should be considered.	As per above
Concern that civil rights are being encroached on.	Comment on this is beyond the scope of this project.
Summary	
The objector has concerns that do not affect assessment of Representative Buildings.	

Recommendation
305 and 307 Halifax Street are <u>recommended</u> for inclusion as Representative Buildings.

4. OBSERVATIONS

This section includes observations on the *Draft Historic Area Statement Update Report (CoA Oct24)* that have come to our awareness from the assessment process and our review of objections and depositions. This is not a comprehensive review of the content of the Historic Area Statements. The focus these observations and queries is on points raised that we think warrant attention outside of the main task of Representative Building Assessment.

4.1. BASIS OF HISTORIC ERAS AND STYLES INCLUDED IN AREAS

There would be value in undertaking a review of the included historic eras to provide clear justification including:

- Reasons for the inclusion of this era in the first place, and reasons to continue including this era should be documented and explained with appropriate rigour, so it can be clearly understood by owners and stakeholders;
- How significant was this era of development to the local area – a more comprehensive review of the broader Historic Area Overlay may be required;
- To what extent are the characteristics of each era demonstrated within the streetscape.

4.2. SUFFICIENT / APPROPRIATE REPRESENTATIVE BUILDINGS

Where eras and styles are detailed in the Historic Area Statements, reference to any Representative Buildings should be included in the same way that Local and State Heritage Places are included. Representative Buildings should support the Historic Area Statements i.e. if the streetscape character is defined by eras and styles this should be underpinned by Representative Building examples.

The *Draft Historic Area Statement Update Report (CoA Oct24)* notes typically that the historic built form and character is established by State and Local Heritage Places. This raises the question of whether more details should be provided as to which Heritage Listed Properties display characteristics to inform desired outcomes. This is because State and Local Heritage Listing addresses distinctly different criteria. For example, some Listed places may be of a unique typology in the streetscape and their listing may be due to significance other than architectural style or representation of an era. This is not a view to downgrade or remove any existing listings rather it is a question as to whether these listed properties can also be Representative Buildings to support more accurate representation within any particular area - which would better meet the objectives of the meaning of this term.

As noted in the Project Overview, a clear set of criteria or benchmarks for designation of Representative Buildings would assist greatly in clearly aligning the application of the Historic Area Overlay to defined areas, including clear designation of Representative Buildings, Local Heritage Places, and State Heritage Places. Several objections noted that evidence of low integrity previously provided as objection to Local Heritage assessments appear to have been overlooked in the current proposal for Representative Buildings. This highlights the need for clear definitions and explanation of the various 'levels' of heritage protection within the Code.

4.3. EDITORIAL FEEDBACK

The following has been observed for editorial correction.

Dates of eras	The Historic Area Statement (Adel 1) notes different dates for the Victorian Period (1837 – 1901) under Themes and Context, and Early Victorian Houses (1840s to 1860s) / Victorian Houses (1870 to 1890) - this should be explained or consolidated to avoid confusion.
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